



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 1:13-CR-0109-01
:
v. : (Chief Judge Conner)
:
MARIA COLVARD :
Defendant: :

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT I

(Extortion by person representing herself
to be an officer of the United States)

From on or before February 22, 2013, and ending on or about May
10, 2013, in York County, within the Middle District of Pennsylvania,
and elsewhere, the defendant,

MARIA COLVARD,

did aid, abet, counsel, command, induce and procure Merarys Paulino,
a/k/a Labella Williams, in representing herself to be and assuming to
act as an employee of the United States, under color and pretense of
office and employment did commit and attempt to commit extortion, in
that **MARIA COLVARD** obtained, attempted to obtain and conspired to

obtain the property of Christina's Tax Service by the wrongful use of fear, including fear of economic loss.

All in violation of Title 18 United States Code, Sections 872 and 2.

COUNT II

(False Personation of Employee of the United States)

From on or before February 22, 2013, and ending on or about May 10, 2013, in York County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

MARIA COLVARD,

did aid, abet, counsel, command, induce and procure Merarys Paulino, a/k/a Labella Williams to falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is a criminal investigator with the Internal Revenue Service, and in such assumed and pretended character with intent to defraud did falsely demand and obtain a thing of value, in that Merarys Paulino, a/k/a Labella Williams demanded on behalf of the United States the client list of Cristina's Tax Service, money and closure of Cristina's Tax Service.

All in violation of Title 18 United States Code, Section 912.

COUNT III

(Interference With Commerce By Threats)

From on or before February 22, 2013, and ending on or about May 10, 2013, in York County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

MARIA COLVARD,

did obstruct, delay and affect, attempt to obstruct, delay and affect and conspired to obstruct, delay and affect commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951, that is **MARIA COLVARD** and Merarys Paulino, a/k/a Labella Williams obtained, attempted to obtain and conspired to obtain the property of Christina's Tax Service with the owner's consent induced by the wrongful use of fear, including fear of economic loss, and did aid, abet, counsel, command, induce and procure the same.

All in violation of Title 18 United States Code, Sections 1951 and 2.

COUNT IV

(Tampering With a Witness)

On or about January 6, 2014, in Franklin County, within the Middle District of Pennsylvania, the defendant,

MARIA COLVARD,

did knowingly intimidate and threaten Merarys Paulino by stating to Merarys Paulino, “you will pay,” and “watch your back,” with the intent to influence and prevent the testimony of Merarys Paulino in an official proceeding, to wit: the criminal trial in *United States v. Maria Colvard*, Criminal No. 1:13-CR-109.

All in violation of Title 18, United States Code, Section 1512(b)(1).

COUNT V

(Tampering With a Witness)

On or about June 2013, in the Middle District of Pennsylvania, the defendant,

MARIA COLVARD,

did knowingly attempt to corruptly persuade Merarys Paulino not testify against her by offering Merarys Paulino \$50,000 in payment, with the intent to influence and prevent the testimony of Merarys Paulino in an official proceeding, to wit: the criminal trial in *United States v. Maria Colvard*, Criminal No. 1:13-CR-109.

All in violation of Title 18, United States Code, Section 1512(b)(1).

Peter J. Smith *sp*
PETER J. SMITH
UNITED STATES ATTORNEY

A TRUE BILL


Foreperson

15 Jan 14
Date